



## **Bethel Services Inc.**

A subsidiary of Bethel Native Corporation

Date: October 1, 2012

Contract # W911KB-11-C-0026

Bethel Project # 2011103

**RE: TECHNICAL MEMORANDUM: PORT HEIDEN PCB SOIL WASTE  
TRANSPORTATION AND DISPOSAL - OVERWINTER STORAGE OF  
NON-TSCA SUPER SACKS**

The U.S. Army Corps of Engineers (USACE) contracted Bethel Services Inc. (Bethel) on behalf of the U.S. Air Force (USAF) to prepare this Technical Memorandum to address the temporary storage of approximately 1,123 ten-cubic yard (CY) super sacks of polychlorinated biphenyl (PCB)-contaminated soil. This soil was packaged and staged for transport via barge and disposal at an off-site disposal facility. Due to inclement weather conditions, these sacks will be temporarily stored until 2013. As of this writing, of the five barges that started loading in August 2012 that were scheduled to be in Seattle by 15 September, only one has been able to transverse the Gulf of Alaska, due to inclement weather. Due to this development and the 2011 late fall barge issues, it has been determined that additional barges this fall are too risky. This Technical Memorandum will outline the storage plan for the super sacks until they are transported and disposed of during 2013.

Bethel was contracted by USACE on behalf of the USAF to fill, transport, and dispose of approximately 25,000 CY of non-Toxic Substances Control Act (TSCA), PCB-contaminated soil along with 40 CY of TSCA-regulated soil in 2011, 2012, and 2013.

Bethel filled, staged, and transported, or is in the process of transporting 1566 super sacks in 2012 (not including the 2011 super sacks which were transported in May 2012) via barge that will ultimately be disposed of at Waste Management's facility in Arlington, OR. Approximately 1,123 super sacks are staged at the bag storage area in Port Heiden and will be transported in the spring / summer of 2013.

The super sacks staged in Port Heiden are stored on geo fabric covered with 20-mil polyethylene liner that meets the specifications outlined within the *Alaska Administrative Codes 18 AAC 75.370 Table D Bottom Liner Specifications* and will be completely covered and secured by 12-mil reinforced polyethylene liner and covered with sandbags. The geofabric and liner were sited in a lay-down area that has been cleared of debris and other sharp objects. The footprint of the temporary storage area will be approximately 333-feet by 103-feet in size, with the super sacks stacked two high. The materials to cover the bags are scheduled to be arriving in Port Heiden via air cargo transports on 2 and 3 October for installation directly thereafter.

This non-TSCA regulated contaminated soil contains PCB concentrations at or below 50 mg/kg as determined through analytical testing. The sampling was performed by Jacobs Engineering (Jacobs) during the Site Road Characterization and Cleanup effort performed in Port Heiden during 2012.

The temporary storage area will be located near the barge landing but located greater than 100 feet from all surface water bodies, all private water systems, all Class C Public water systems as defined in 18 AAC 80.1990, or any fresh water systems that use groundwater for a use designated in 18 AAC 70.020(a)(1)(A) and 18 AAC 70.050(a)(2). There are no community wells in Port Heiden and all public water systems are more than 3,000 feet from the proposed storage area.

The storage area will be visually inspected once a month, as accessible, to ensure that the cover liner remains secured. The liner will be secured as necessary until the material is transported from the site. Photographs will be taken for documentation and provided to the USACE upon completion of the installation.

If you have questions or comments, please call the undersigned at (907) 644-1771 or the Bethel office at (907) 522-6311. We appreciate the opportunity to be of service to you.

Sincerely,  
**Bethel Services Inc.**

A handwritten signature in cursive script, appearing to read "Carrie Godden".

Carrie Godden  
Program Manager